

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFERY C. WILLIAMS,

Defendant.

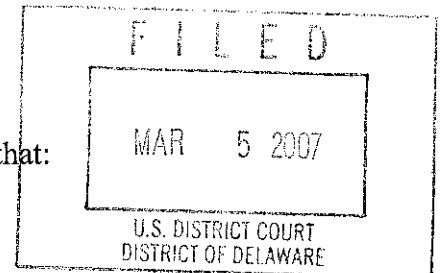
Criminal Action No. 07- **32-UNA**

**INFORMATION**

The United States Attorney for the District of Delaware charges that:

**Count One**

***Introduction***



1. At all times material to this Information, there existed a private management company based in Wilmington, Delaware (the management company), that managed apartment complexes in Delaware and received in excess of \$10,000 in grants, contracts, subsidies, loans, guarantees, insurance and other forms of federal assistance from the United States Department of Housing and Urban Development (HUD) during the calendar year 2005, and therefore was an organization within the meaning of Title 18, United States Code, Section 666(a) and (b).

2. At all times material to this Information, the defendant, Jeffrey C. Williams, was an agent of the management company, in that the defendant was the property manager of its apartment complexes in New Castle County, Delaware - specifically, the Kimberton Apartments, the Stoneybrook Apartments, and the Carleton Court Apartments.

3. From on or about August 11, 2005, through on or about October 6, 2005, in the District of Delaware, the defendant, Jeffrey C. Williams, fraudulently caused the management company to

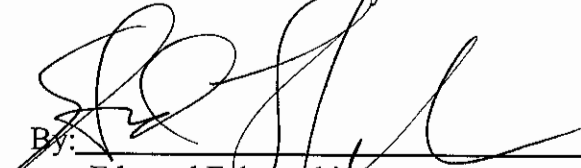
issue checks payable to third-party service providers based on false invoices that he created and issued to the management company. The defendant then deposited those checks into his bank account and converted the funds to his own use. During the time period specified herein, the amount of these checks issued by the management company exceeded the sum of \$5,000, specifically \$9,439, as follows:

Date of Check	Check Number	Amount of Check
9/08/05	11456	\$3,340
9/01/05	10438	\$2,195
10/06/05	10538	\$3,720
8/11/05	10406	\$184

***Charging Paragraph***

4. From on or about August 11, 2005, through on or about October 6, 2005, in the District of Delaware, the defendant, Jeffrey C. Williams, being an employee of the management company which received in excess of \$10,000 federal assistance during the calendar year 2005, intentionally did steal property valued at \$5,000 or more and owned by and under the care, custody, and control of the management company, in violation of Title 18, United States Code, Section 666(a)(1)(A)(i) and (ii).

COLM F. CONNOLLY  
United States Attorney

By:   
Edmond Falgowski  
Assistant United States Attorney

Dated: 3-5-07